

## Murray Law LLC

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# MEMO ENDORSED

October 25, 2010

Via Email

Hon. Richard J. Sullivan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

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U.S.A. v. Goffer, et al., 10 cr 0056

Dear Judge Sullivan:

We write on behalf of defendants Craig Drimal and Zvi Goffer and with the government's consent to request a one-week extension of the motion schedule in the above-captioned case. Defense motions are currently due on Wednesday, October 27, 2010. We ask that the due date be extended to November 3, 2010, and that all other dates in the schedule be extended by one week so that the government's opposition now due December 1, 2010 be adjourned to December 8, 2010 and the defendant's reply brief now due on December 10, 2010 be extended to December 17, 2010. We note that the court has scheduled a hearing for December 29, 2010 which is unaffected by this request for adjournment.

We seek this adjournment because last week, on October 22, 2010, the defendants received additional discovery from the government in the form of previously unproduced calls, additional line sheets with minimization efforts detailed, and the government's analysis of unmonitored call sessions. This production was in response to a letter from Zvi Goffer's counsel, Cynthia M. Monaco, dated August 20, 2010. In that letter, Ms. Monaco had identified a large volume of calls that appeared on summary spreadsheets but for which no calls had been produced.

Faced with the production of additional calls and linesheet data, counsel now seek a short adjournment to review those calls, allow our clients to review those calls, and to confer as to how these calls should be included in the analysis we have prepared on the government's efforts to minimize non-pertinent and private calls on our clients' telephones.

In addition to the new calls, we also need time to review the government's new linesheets for all wiretap interceptions on the defendants' telephones.

Since we are coordinating our pretrial motions with some of the other defendants, we ask that this extension be granted to all defendants.

We have conferred with the government, and AUSA Fish has advised us that the government has no objection to this request.

Hon. Richard J. Sullivan

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Thank you for your attention to this matter.

Sincerely,



JaneAnne Murray  
Attorney for Mr. Drimal

Cynthia M. Monaco  
Anderson Kill & Olick LLP  
Attorney for Mr. Goffer

cc: All counsel (via E-mail)

SO ORDERED  
Dated:



RICHARD J. SULLIVAN  
U.S.D.J.

10/25/10